

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TAJI HASAN,

Plaintiff,

DECLARATION OF SERVICE  
07 CV 11467 (VM)(RLE)

- against -

THE CITY OF NEW YORK, ET AL.,

Defendants.

STATE OF NEW YORK        )  
                                 : SS. :  
COUNTY OF KINGS            )

Jury Trial Demanded

MATTHEW FLAMM, declares the following under penalty of perjury  
pursuant to 28 U.S.C. §1746:

That on December 21, 2007, I served the COMPLAINT upon defendant  
CITY OF NEW YORK by personally delivering a copy to 100 Church Street, New  
York, New York, that being the address within the State designated for that  
purpose, as evidenced by the date/time stamp appearing on the first page of the  
Complaint.

Upon receipt of this copy of Taji Hasan, I will serve a copy of the same to  
28 U.S.C. §1331, as well as compensation for the reasonable expenses of his  
civil rights under 42 U.S.C. §1983.

*Matthew Flamm*

Jurisdiction and Venue

2. This action arises under the United States Constitution and 42  
U.S.C. §1983. The Court has subject matter jurisdiction pursuant to 28 U.S.C.  
§1331 and §1333. Plaintiff asserts jurisdiction over the City of New York under  
28 U.S.C. §1337. Plaintiff requests that this Court exercise pendent jurisdiction  
over those state law claims arising out of the same common nucleus of operative  
facts as do plaintiff's federal claims.

3. Under 28 U.S.C. §1331(b) and (e), venue is proper in the Southern  
District of New York because defendant City of New York resides in that judicial  
District.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TAJI HASAN,

Plaintiff,

- against -

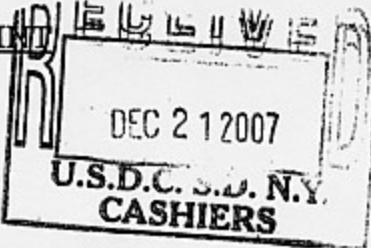
THE CITY OF NEW YORK, ARMANDO  
ERAZO and "JOHN" CALHOUN, the first  
name being fictitious and presently  
unknown, employees of the New York City  
Police Department,

Defendants.

JUDGE MARRERO

07 CV 11467

COMPLAINT



Jury Trial Demanded

Taji Hasan, by his attorney, Matthew Flamm, alleges the following upon  
information and belief as his Complaint:

Nature of the Action

1. This civil rights action arises from the July 31, 2007 unlawful  
assault on and arrest of Taji Hasan. Plaintiff seeks declaratory relief pursuant to  
28 U.S.C. §2201 as well as compensatory and punitive damages for violation of his  
civil rights under 42 U.S.C. §1983.

Jurisdiction and Venue

2. This action arises under the United States Constitution and 42  
U.S.C. §1983. This Court has subject matter jurisdiction pursuant to 28 U.S.C.  
§1331 and §1343(3). Plaintiff asserts jurisdiction over the City of New York under  
28 U.S.C. §1367. Plaintiff requests that this Court exercise pendent jurisdiction  
over those state law claims arising out of the same common nucleus of operative  
facts as do plaintiff's federal claims.

3. Under 28 U.S.C. §1391(b) and (c), venue is proper in the Southern  
District of New York because defendant City of New York resides in that judicial  
District.